

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

BRYAN SAMs,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:24-cv-00602-SH
)	
JOHNSON MATTHEY, INC., d/b/a)	Removed from Tulsa County
TRACERCO, a foreign corporation,)	Case No. CJ-2024-4271
THE UNIVERSITY OF TULSA, a not-for-)	
profit Oklahoma Corporation,)	
CHEVRON USA, INC., a foreign corporation)	
CHASE ENVIRONMENTAL GROUP, INC.)	
a foreign corporation,)	
CHINA INSTITUTE OF ATOMIC ENERGY)	
a foreign corporation,)	
)	
Defendants.)	

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER,
MOVE AGAINST, OR OTHERWISE RESPOND TO PLAINTIFF'S PETITION**

Defendants Johnson Matthey Inc. d/b/a Tracerco ("Tracerco"), the University of Tulsa ("TU"), Chevron USA, Inc. ("Chevron"), and Chase Environmental Group, Inc. ("Chase") (collectively, Defendants) jointly move under Federal Rule of Civil Procedure 7(b) and LCvR7-1(g) for an extension of forty-five (45) days or until February 3, 2025 to answer, move against, or otherwise respond to Plaintiff's Petition. In support of this Motion, Defendants state as follows:

1. Plaintiff filed his Petition in District Court of Tulsa County, State of Oklahoma on November 12, 2024. (ECF No. 2-2).
2. Plaintiff served Tracerco on November 21, 2024. (ECF No. 2, ¶ 11).
3. Tracerco timely removed this action from District Court of Tulsa County, State of Oklahoma to this Court on December 11, 2024. *See id.*

4. Under Federal Rule of Civil Procedure 81(c), Tracerco's answer to Plaintiff's Petition is currently due on December 18, 2024.

5. Based on respective dates of service and Rule 81(c), defendants TU and Chevron's answers to Plaintiff's Petition are also due on December 18, 2024.

6. Chase was served on December 2, 2024, setting Chase's answer date as December 23, 2024.

7. This is the first request for an extension of time sought by any Defendant, and it is sought in good faith and not for the purpose of delay. Defendants request the additional time as sought by this Motion so as to obtain client documents, to confer with client representatives, and to review and investigate Plaintiff's claims in order to prepare an appropriate response to the Petition. This extension of time will also set a uniform deadline date for all Defendants.

8. The undersigned counsel contacted Plaintiff's counsel regarding this request. Plaintiff's counsel advised that the undersigned may indicate that Plaintiff does not oppose Defendants' requested 45-day extension.

9. This action is not presently set for trial and no scheduling order has been entered; thus, granting this motion will not delay or adversely affect the trial date or any deadlines.

10. A proposed order is being submitted simultaneously to the Court for consideration under LCvR7-1(g).

Defendants respectfully request that the Court issue an Order extending the time for all currently served Defendants—Tracerco, TU, Chevron, and Chase—to respond to Plaintiff's Petition by motion, answer, or other responsive filing until February 3, 2025.

Respectfully submitted this 17th day of December, 2024.

/s/ Mary Quinn Cooper

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of December 2024, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following registrants:

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